

Attorney for Debtor  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

IN RE: Michelle L. Avent, Debtor

Case No. : 15-31782  
Chapter 13

Motion for Extension of Time To File Schedules  
Statements and Chapter 13 Plan

Comes now the debtor, Michelle L. Avent, by counsel, Pia J. North, Esq., pursuant to Federal Bankruptcy Rules 1007, 3015 and 9006 on the debtor's Motion to Extend the Time to File Schedules, Statement of Financial Affairs, Statement of Attorney Compensation, and Chapter 13 Plan. The debtor represents the following:

1. On April 6, 2015, the debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code. The expiration of the time to file the schedules, statement and plan is April 20, 2015. The date for the meeting of creditors is May 14, 2015.

2. The debtor filed a list of creditors' addresses, but debtor's counsel has been unable to prepare a schedule of assets and liabilities and statement of affairs due to the incomplete condition of the financial records of the debtor and insufficient time of counsel and agents of debtor to prepare adequate records.

Now therefore, debtor respectfully requests that the court grant debtor fourteen additional days from the date the plan was first due and an extension until seven days prior to the §341 hearing to file schedules of assets and liabilities, statement of affairs pursuant to 11 U.S.C. §521(1) and Current Monthly Income statement.

Respectfully submitted:  
Michelle L. Avent

By: /s/ Pia J. North  
Counsel

Certificate of Service

I hereby certify that on this 4/20/2015, I mailed the foregoing Motion to Extend Time by electronic mail or postage pre-paid to: The Chapter 13 Trustee, the United States Trustee at 701 E. Broad Street, Room 4304, Richmond, VA 23219, and to all creditors and parties of interest herein.

/s/ Pia J. North  
Pia J. North

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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

IN RE: Michelle L. Avent, Debtor

Chapter 13  
Case#: 15-31782

**Notice of Motion to Extend Time to File**  
**Chapter 13 Plan, Statement of Financial Affairs and Schedules,**

Michelle L. Avent has filed papers with the Court to obtain Extension of Time to File Schedules, Statement of Financial Affairs and Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the motion to extend time, or if you want the Court to consider your views on the motion, then on or **before seven days from date of service**, you or your attorney must:

File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 4001(a)-1(c) and 9013-1(H). If you mail your response to the court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above. You must mail a copy of your response to the following:

**Clerk of Court**  
**U.S. Bankruptcy Court**  
**701 E. Broad Street, Rm. 4000**  
**Richmond, VA 23219**

**Pia J. North, Esq.**  
**5913 Harbour Park Drive**  
**Midlothian, VA 23112**

**U.S. Trustee**  
**701 E. Broad Street, Rm. 4304**  
**Richmond, VA 23219**

**Carl M. Bates, Trustee**  
**P.O. Box 1819**  
**Richmond, VA 23218-1819**

Attend the preliminary hearing to be scheduled by the Clerk of Court, notice of which will be mailed at a later date. **If no timely response has been filed opposing the relief requested, the Court may grant the relief requested in the motion to extend time.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motions, and may enter an order granting that relief.

/s/ Pia J. North  
Pia J. North, Esq.

4/20/2015  
Date

**Certificate of Service**

I hereby certify that I have this 4/20/2015 mailed a true copy of this Motion to Extend Time to the parties listed on the attached motion.

/s/ Pia J. North  
Pia J. North

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**United States Bankruptcy Court  
Eastern District of Virginia  
Richmond Division**

In re: Michelle L. Avent, Debtor

Case No. 15-31782  
Chapter 13

**NOTICE**

PLEASE TAKE NOTICE that the debtor's Motion to Extend the time for filing Schedules, Statement of Affairs has been extended to seven days prior to the §341 hearing and the Chapter 13 Plan has been extended an additional fourteen days from the date it was first due. The deadline for filing objections to confirmation is not less than seven days prior to the Confirmation hearing. There will be no confirmation hearing if no timely objections are filed.

Respectfully submitted:

Michelle L. Avent

BY: /s/ Pia J. North  
Counsel

**CERTIFICATE**

I hereby certify that on this 4/20/2015, I mailed the foregoing document by electronic mail or first class mail, postage pre-paid to: United States Trustee at 701 E. Broad Street, Room 4304, Richmond, VA 23219, The Chapter 13 Trustee, and all creditors and parties in interest herein.

/s/ Pia J. North  
Pia J. North